

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
NAVID AFSHAR
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Navid_Afshar@fd.org

6 Attorney for Trevor Pritchett

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TREVOR PRITCHETT,

14 Defendant.
15

Case No. 2:22-cr-00151-JCM-DJA-1

STIPULATION TO CONTINUE
CHANGE OF PLEA DATE
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Navid
20 Afshar, Assistant Federal Public Defender, counsel for Trevor Pritchett, that the hearing for
21 change of plea, currently scheduled for December 2, 2022, be vacated and set to a date and time
22 convenient to this Court, but no sooner than twenty (20) days.

23 The Stipulation is entered into for the following reasons:

- 24 1. Defense counsel has a conflict for the change of plea hearing.
- 25 2. Counsel for government recently left office and new counsel will come on.
- 26 3. The defendant is not incarcerated and does not object to the continuance.
4. The parties agree to the continuance.

1 1. The additional time requested herein is not sought for purposes of delay, but
2 merely to allow the parties to efficiently appear for Mr. Pritchett to enter a change of plea.

3 2. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice. The additional time requested by this Stipulation is excludable in computing the time
5 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
6 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
7 Section 3161(h)(7)(B)(i), (iv).

8 This is the first stipulation to continue filed herein.

9 DATED this 1st day of December, 2022.

10 RENE L. VALLADARES
11 Federal Public Defender

JASON M. FRIERSON
United States Attorney

12 By /s/ Navid Afshar

By /s/ Christopher Burton

13 NAVID AFSHAR
Assistant Federal Public Defender

CHRISTOPHER BURTON
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TREVOR PRITCHETT,

7 Defendant.

Case No. 2:22-cr-00151-JCM-DJA-1

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. The parties have agreed to a change of plea and a joint recommendation for
14 sentencing.

15 2. Defense counsel has a conflict for the change of plea hearing.

16 3. New counsel for the government has come on the case.

17 4. The defendant is not incarcerated and does not object to the continuance.

18 5. The parties agree to the continuance.

19 6. The additional time requested herein is not sought for purposes of delay, but
20 merely to allow counsel for defendant sufficient time within which to be effectively appear for
21 a change of plea.

22 7. Additionally, denial of this request for continuance could result in a miscarriage
23 of justice. The additional time requested by this Stipulation is excludable in computing the time
24 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
25 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
26 Section 3161(h)(7)(B)(i), (iv).

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively appear for a change of plea hearing, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

ORDER

IT IS FURTHER ORDERED that the change of plea hearing, currently scheduled for December 2, 2022, at the hour of 11:00 a.m. be vacated and continued to **January 9, 2023, at 10:30 a.m.**

DATED December 1, 2022.

James C. Mahan
UNITED STATES DISTRICT JUDGE